

November 4th, 2019

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1 between CTEK Sweden and CTEK Inc.

2 Q. Does CTEK Inc. have resellers in
3 North America?

4 A. Yes.

5 MR. COVEY: Objection to form.

6 Q. Does CTEK Inc. have resellers in the
7 United States of America?

8 A. Yes.

9 Q. Do you know how many?

10 A. No.

11 MR. COVEY: Again, I believe that
12 this is beyond the scope of the CTEK
13 Sweden 30(b).

14 Q. Which entity, CTEK Sweden or CTEK
15 Inc. enters into the agreements with the
16 resellers?

17 A. Could you repeat that question,
18 please?

19 Q. With respect to United States
20 resellers, which entity, CTEK Sweden or CTEK
21 Inc., enters into those agreements?

22 A. CTEK Inc.

23 MR. PINNEY: Let's mark an exhibit,
24 I think, that we found online for the
25 witness.

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1 maintain offices or places of business in all
2 other facilities in the territory as deemed
3 required by service recipient in order to
4 perform its obligations under this agreement."

5 Do you see that?

6 A. Yes.

7 Q. Has service provider, meaning CTEK
8 Sweden, done so?

9 A. No.

10 Q. Why not?

11 A. CTEK Inc. has taken care of that.

12 Q. At any point has CTEK Sweden
13 maintained offices or places of business in
14 the territory?

15 A. No, not according to my knowledge.

16 Q. Has CTEK Sweden ever loaned CTEK
17 Inc. any money?

18 MR. COVEY: Objection to form.

19 A. We have loan agreement between the
20 companies.

21 Q. Describe that.

22 A. I cannot. I don't have the details.
23 But there is a loan agreement between the
24 companies. If we have used that or not, I
25 don't know that today sitting here.

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1 Q. So you're the CEO, and you don't
2 know if either party has used a loan
3 agreement?

4 A. Correct.

5 Q. Section 3.5 states in the last
6 paragraph, "Service recipient shall at all
7 reasonable times have access to service
8 provider's premises for inter alia inspecting
9 these records and accounts." Do you see that?

10 A. Where did I read? Sorry, I lost
11 you.

12 Q. I apologize. The last sentence of
13 section 3.5.

14 MR. COVEY: It's not the last. It's
15 above that paragraph.

16 MR. PINNEY: Oh, I see. You're
17 right, I apologize. There's a sentence
18 below. Ignore that one.

19 A. Could you please repeat?

20 Q. Sure. In the first paragraph of
21 3.5, the last sentence of that first
22 paragraph, it states, "Service recipient shall
23 at all reasonable times have access to service
24 provider's premises for inter alia inspecting
25 these records and accounts." Do you see that?

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1 Q. When you, as the CEO of CTEK Sweden,
2 describe the activities of CTEK Inc., do you
3 reference any policies prior to doing so?

4 MR. COVEY: Objection to form.

5 A. Please ask that question again.

6 Q. Sure. Before you publicly discuss
7 the business activities of CTEK Inc., do you
8 reference any policies before doing so?

9 MR. COVEY: Objection to form.

10 A. I cannot recall that there are
11 policies that I read in policies before I'm
12 talking about CTEK Inc., no.

13 Q. Does CTEK Sweden or CTEK Holdings
14 have any policies or procedures designed to
15 prevent the public from being confused about
16 the differences between the parent and the
17 subsidiary entities?

18 MR. COVEY: Objection to form.

19 A. You refer to policies?

20 Q. Yes, or procedures.

21 A. Or procedures.

22 MR. COVEY: Again, objection to
23 form.

24 A. I can only refer to our company
25 presentation that describe the way we operate

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1 the company.

2 Q. And what presentation is that?

3 A. I don't have a name of the
4 presentation.

5 Q. Can you describe it?

6 A. Not in details.

7 Q. Can you describe what it says with
8 respect to the issue of maintaining a
9 distinction between the parent and subsidiary
10 entities?

11 MR. COVEY: Objection.

12 A. The company presentation describe
13 how we operate on a global basis in different
14 markets. So from my point of view, that
15 describe that part you're asking about,
16 totally or partly.

17 Q. Who has a copy of that presentation?
18 Do you?

19 A. I can ask for it.

20 Q. Does CTEK Sweden maintain what is
21 known as a CRM system?

22 A. Could you ask that question again?

23 Q. Are you familiar with the acronym
24 CRM?

25 A. Yes, I am.